

24 Copper ports - 21 in use
2 Fiber ports - 1 in use gray & white

2. Cajun P120 X120T8 10.1.12.2
32 Copper ports - 29 in use

3. Cajun P120 X120F2 10.1.12.3
24 Copper ports - 21 in use
2 Fiber ports - 1 in use gray & white

4. Cajun P120 X120T8 10.1.12.4
32 Copper ports - 5 in use

SUMMARY

134 Runs in back
4 Cross-over
138
112 Copper ports Available
26 Short

Subject: HS pg6

HIGH SCHOOL

A. G13 Closet
1. Cajun P120 X120F2 10.1.12.8
24 Copper ports - 23 in use
2 Fiber ports - 1 in use gray & white

2. Cajun P120 X120T8
32 Copper ports - 30 in use

3. Cajun P120 X120F2
24 Copper ports - 22 in use
2 Fiber ports - 1 in use gray & white

4. Cajun P120 X120T8
32 Copper ports - 30 in use

SUMMARY

123 Runs in back
4 Cross-over
127

112 Copper ports Available
15 Short

Subject: HS pg7

HIGH SCHOOL

A. H22 Closet (2 Cajun P550)

- 1. Cajun P550 M5500-SUP 10 Base-T plugged in
10.1.12.25**
- 2. M5502-1000SX-F 2 Fiber ports All in use orange**
- 3. M5520-100TX 20 Copper ports All in use**
- 4. M5520-100TX 20 Copper ports All in use**
- 5. M5520-100TX 20 Copper ports All in use**
- 6. M5520-100TX 20 Copper ports All in use**
- 7. M5520-100TX 20 Copper ports All in use**

#2

- 1. Cajun P550 M5500-SUP 10 Base-T plugged in
10.1.12.26**
- 2. M5520-100TX 20 Copper ports All in use**
- 3. M5520-100TX 20 Copper ports All in use**
- 4. M5520-100TX 20 Copper ports All in use**
- 5. M5520-100TX 20 Copper ports All in use**
- 6. M5520-100TX 20 Copper ports All in use**
- 7. M5520-100TX 20 Copper ports All in use**
- 8. ASANTE 12 Copper ports 11 in use**

SUMMARY

300 Runs in back

8 cross-overs

308

220 Copper ports Available

88 Short

Subject: HS pg8

HIGH SCHOOL

A. G209 Closet

1. Cajun P120 X120F2 10.1.12.20

24 Copper ports - 23 in use

2 Fiber ports - 1 in use gray & white

2. Cajun P120 X120T8 10.1.12.21

32 Copper ports - All in use

3. Cajun P120 10.1.12.22

24 Copper ports - 21 in use

SUMMARY

172 Runs in back

4 Cross-over

176

80 Copper ports Available

96 Short

Subject: Summary

End Summary:

You should have received 20 emails plus this one.

194 shortages in Grade schools

383 shortages at High school

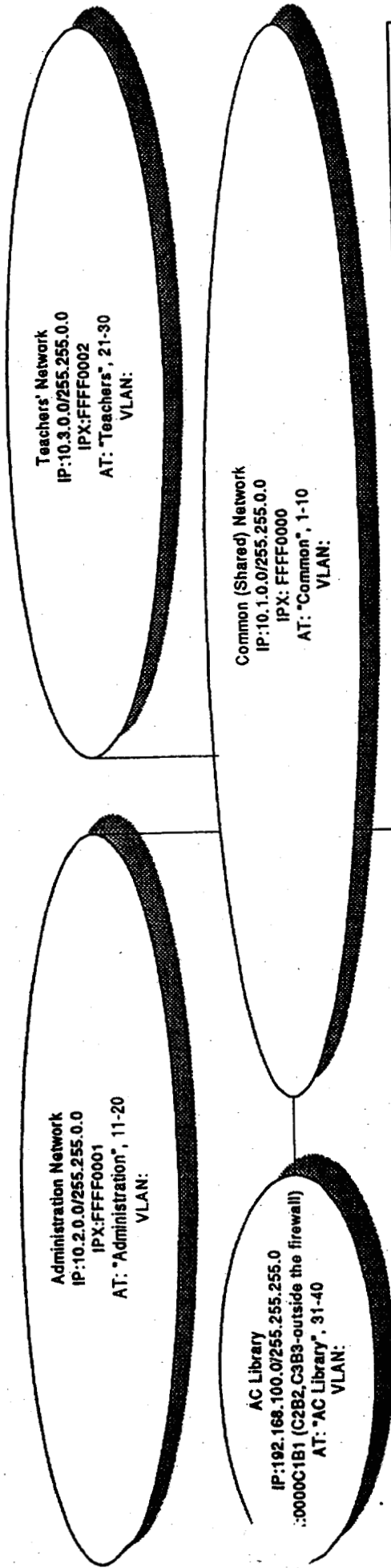
577 Total shortages

See if you get the same totals.

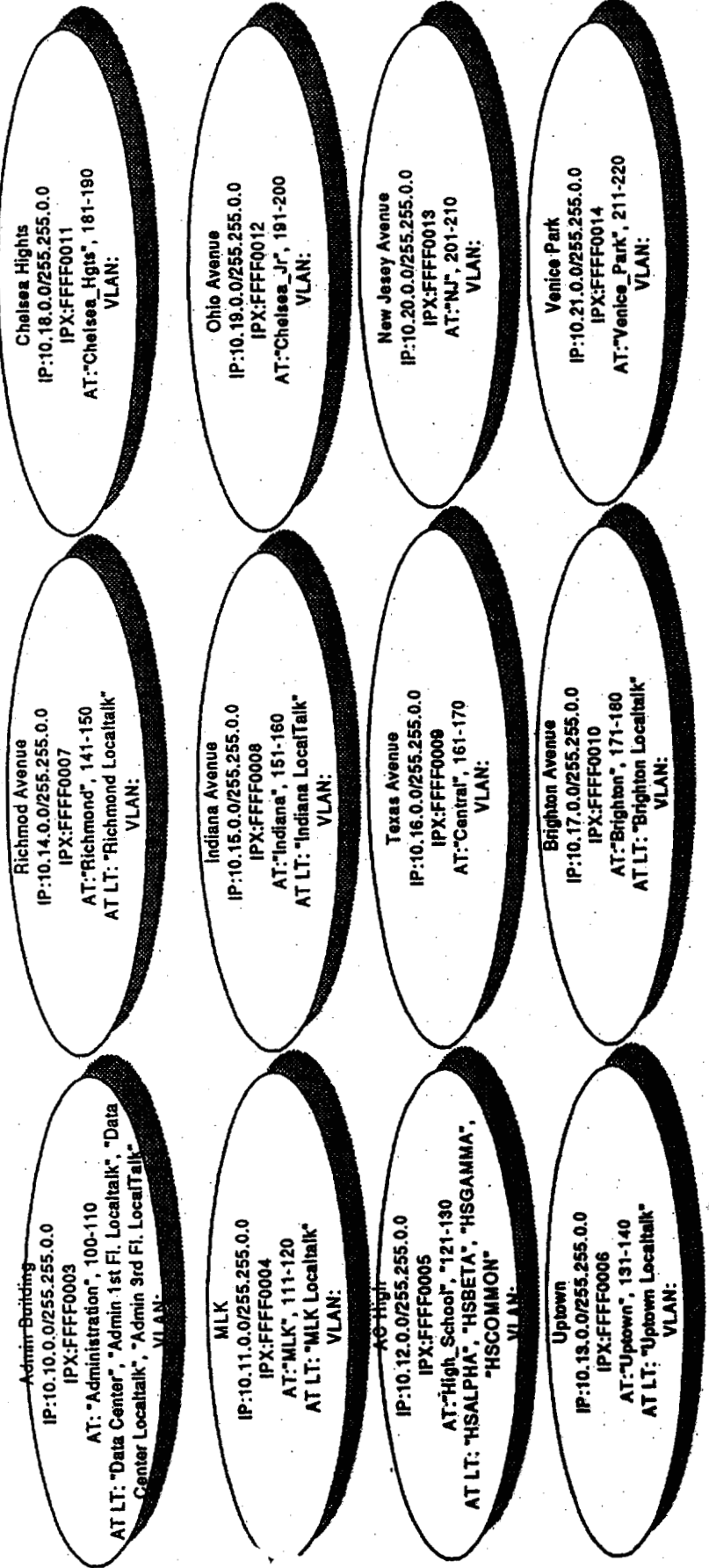
Hope this is helpful.

Thanks,
Marty

Network Diagram of ACBOE (IP, IPX, AppleTalk)



Students' (local) Networks



1 SUPERIOR COURT OF NEW JERSEY
2 LAW DIVISION - ATLANTIC COUNTY
3 DOCKET NO. ATL-L-477-04

4 RELCOMM, INC.,
5 Plaintiff,
6 vs.
7 ATLANTIC CITY BOARD OF EDUCATION;
8 FREDERICK P. NICKELS; MICRO
9 TECHNOLOGY GROUPE, INC.; DONNA
10 HAYE; MARTIN FRIEDMAN; ALEMAR
11 CONSULTING; and JOHN DOES 1-20,
12 Defendants.

13 -----
14 Wednesday, October 13, 2004
15 -----

COPY

16 Oral sworn deposition of MARTIN
17 FRIEDMAN, taken at the law offices of Flaster
18 Greenberg, 1810 Chapel Avenue West, Cherry Hill, New
19 Jersey, before Robert J. Boccolini, Certified
20 Shorthand Reporter and Notary Public of the State of
21 New Jersey, on the above date, commencing at 11:05
22 a.m., there being present:

23 FLASTER GREENBERG
24 1810 Chapel Avenue West
25 Cherry Hill, NJ 08002
BY: J. PHILIP KIRCHNER, ESQ.
Attorneys for Plaintiff

26 -----
27
28 TATE & TATE
29 The Lexington Building, Suite 5
30 180 Tuckerton Road
31 Medford, New Jersey 08055
32 (856) 983-8484 - (800) 636-8283
33 www.tate-tate.com

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1 anything that you think needs to be changed you can
2 indicate that.
3 A. **Thank you.**
4 Q. Okay. Let me show you P-91, Bates numbered
5 66. It is document -- it's an e-mail from Miss
6 Cohen to you; is that right?
7 A. **Yes.**
8 Q. Do you recognize this document?
9 A. **Again, lots of documents. Recognizing it,**
10 **yes, it looks like a document that I received.**
11 Q. She starts out: I will review it with Donna
12 when she gets in from the high school.
13 Do you know what "it" is?
14 A. **No.**
15 Q. Okay. The next sentence refers to a Joe
16 Dougherty. Is that the School Board solicitor or one
17 of the School Board solicitors?
18 A. **I don't know. The name does not sound**
19 **familiar.**
20 Q. Okay. Do you recall Mr. Dougherty asking
21 you questions?
22 A. **I don't know who Mr. Dougherty is. I need**
23 **more context around this in order to be able to**
24 **explain what it is.**
25 Q. Okay. Given the Bates number of this

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1 Q. And you don't believe you've ever seen it
2 before?
3 A. **No, I have not.**
4 Q. Would you have any idea how MTG received this
5 document?
6 MR. BLEE: Objection to the form of the
7 question.
8 THE WITNESS: Any dates or anything on
9 this that identifies it? Is there anything other
10 than the list?
11 Q. Look at the last page under the heading
12 subject colon summary.
13 A. **I see that. It seems to be written to me,**
14 **but I don't ever recall seeing this. I'm sorry.**
15 Q. Well, I would differ with you. It appears
16 that it was written by you. Does that --
17 A. **Thanks, Marty. No, I don't sign my name**
18 **Marty. I'm sorry.**
19 Q. Okay. So that you're saying this definitely
20 did not come from you?
21 A. **Right, this did not come from me, and if it**
22 **was written by somebody by the name of Marty it was**
23 **not me.**
24 Q. Okay. Let me show you what's been marked as
25 P-93. And again, this is a document that is un-Bates

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1 document, this is a document produced by you from
2 your files.
3 A. **Yes.**
4 Q. The last sentence says: He, meaning Mr.
5 Dougherty, will be here about two p.m. so we can open
6 the remaining bids.
7 Does this refresh your recollection about
8 what this was discussing?
9 A. **It really doesn't.**
10 Q. Okay.
11 A. **It really doesn't.**
12 Q. Okay. P-92 I'm showing you.
13 MS. WEINSTEIN: I don't see any Bates
14 numbers on this document.
15 MR. KIRCHNER: No, there are none. For
16 the record, this document has been an exhibit in
17 certain pleadings filed with the Court but it's never
18 been Bates numbered. It was produced to us by MTG in
19 discovery in the federal court action.
20 Q. Have you ever seen these documents?
21 A. **I don't believe so.**
22 Q. Do you know what it is?
23 A. **It looks to be a listing of equipment.**
24 Q. Do you have any idea who prepared this list?
25 A. **No, I do not.**

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1 stamped, but I can represent to you that this has
2 been attached to certain pleadings filed in this case
3 and it was produced to RelComm by MTG in discovery in
4 the federal court action.
5 A. **Okay.**
6 Q. Have you ever seen this document before?
7 A. **Well, the answer ultimately is no, except**
8 **that I believe I saw this document in their**
9 **technology plan.**
10 Q. When you say their, who do you mean?
11 A. **The school district's.**
12 Q. And which technology plan, the one currently
13 in place or the prior one?
14 A. **Prior one.**
15 Q. Okay. Have you seen it anywhere else?
16 MS. WEINSTEIN: Objection. I believe
17 the witness testified that he didn't recognize the
18 document but he believed that he had seen it before.
19 Q. Have you seen it anywhere else?
20 A. **No, I don't believe so. No.**
21 Q. Do you have any idea how this document would
22 have been provided to MTG?
23 MR. BLEE: Objection.
24 THE WITNESS: When was it provided to
25 MTG? I can't answer that.

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1 Q. Okay. Let me show you a document that's
2 been marked as Exhibit P-94, ask you if you've seen
3 this document before?
4 A. Yes.
5 Q. Where have you seen this document?
6 A. This is downloadable from the web by the
7 company who does this. This is marketing material
8 that goes out to redistributors and distributors of
9 their product.
10 Q. And what company is that?
11 A. I don't know. Actually whoever this company
12 is that VPBX -- whatever, Innovative Technology.
13 MR. BLEE: Mr. Kirchner, this is
14 un-Bates stamped. I would assume this was also
15 supplied by MTG in the federal court action.
16 MR. KIRCHNER: Yes, that's correct.
17 MR. BLEE: Thank you.
18 MR. KIRCHNER: And it was produced to
19 RelComm in discovery in the federal court action by
20 MTG.
21 THE WITNESS: This is downloadable. I
22 actually went to the site and downloaded this.
23 Q. When did you do that?
24 A. Certainly not when -- during the Year 6. It
25 was after that.

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1 Q. Okay. Did you see this document somewhere
2 and then go to the website and download it yourself?
3 A. I don't recall. I recall being curious about
4 what RelComm was claiming, that they had shown this
5 to the district and that MTG -- and the district
6 gave it to MTG, and I went to this website and I saw
7 that it was a -- a document that was provided --
8 Q. Okay.
9 A. -- to just about anybody who would want to
10 download it and sell their product.
11 Q. Do you have any knowledge whether MTG relied
12 on this document as support for its bid proposal for
13 Year 6?
14 MR. BLEE: Objection.
15 THE WITNESS: I don't -- I can't answer
16 that. I did not write the proposal with MTG.
17 Q. Have you ever discussed it with MTG or anyone
18 from MTG?
19 A. What is it?
20 Q. It being what it relied on in --
21 A. No.
22 Q. -- providing its Year 6 E-Rate proposal.
23 A. No, I did not.
24 Q. How about Exhibit 93?
25 A. Where is 93? Yes.

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1 MS. WEINSTEIN: Objection.
2 THE WITNESS: Yes. I believe that I was
3 quite startled to hear that you claim that MTG had a
4 document that no other vendor had and I was curious
5 as to what that document was.
6 Q. Okay. How about Exhibit P-92, do you know if
7 MTG relied that document in preparing its Year 6 bid?
8 A. No, I have no knowledge --
9 MR. BLEE: Objection.
10 THE WITNESS: -- what that document is
11 about or what they did with it.
12 MR. KIRCHNER: Okay. I just want to go
13 back and get this marked and I think we're nearing
14 the end here.
15 (P-96, Documents, marked.)
16 Q. Would you take a look at what's been marked
17 as P-96, just a series of documents.
18 Do you recognize these documents?
19 A. No. I have never seen them before.
20 Q. Okay. Have you ever been on the USAC
21 website?
22 A. Several times.
23 Q. Do you recognize these documents as printouts
24 from that website?
25 A. There's nothing on here that indicates that.

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1 There is nothing that says that it is
2 SLDuniversalservice.org, that it was taken from.
3 There is nothing here except that it came from
4 somebody's computer file in Drive A with this file
5 name, so there is no way to confirm that what you're
6 telling me is where it came from.
7 Q. I'm asking if you recognize it as coming from
8 that source?
9 A. I cannot recognize it as coming from that
10 source.
11 Q. Okay. You see on the first page there
12 reference to I-M-H-O-T-E-P Charter School?
13 A. Yes.
14 Q. And then you see a spin number -- several
15 spin numbers?
16 Is -- first of all, do you know how -- how
17 do you pronounce that name, I-M-H-O-T-E-P, do you
18 know?
19 A. Imhotep.
20 Q. Is that a school for which Alemar provided
21 services during the Year 6 E-Rate process?
22 MS. WEINSTEIN: Objection. Objection.
23 I'm going to -- I'm not sure that I'm allowing my
24 client to answer this question. I need to ask him so
25 that I can determine whether --

41 (Pages 364 to 367)

January 30, 2003

Mr. Martin Friedman
442 Lyndhurst Drive
Bromhall, PA 19008

Dear Mr. Friedman,

MICRO Technology Groupe, Inc. (MTG) is pleased to submit this comprehensive proposal for the Atlantic City Board of Education Year 6 E-rate application.

We have proposed a solution for internal connections. This includes: cabling, network electronics, servers, and video. It also includes installation costs, maintenance agreements, and engineering costs.

We have used hardware from Cisco Systems and Compaq (HP) for the servers and network electronics. As you are aware, Cisco and Compaq are widely recognized as leaders in the technology industry.

We have configured the servers as per the bid specifications.

We feel the wiring in many of the schools should be replaced. We are not willing to provide any LAN enhancements using the existing wiring in those schools. We have provided prices to rewire (or add wiring) to the buildings. There is a per drop price for a cable run which will allow you to make any add/deletes to the number of runs that we propose.

We understand the district has two-pair fiber optic cable from each school building to the Dr. Martin Luther King School Complex. We propose to use this fiber as the districts' Wide Area Network links. We propose two Cisco Catalyst 6509 switches to provide redundant WAN connection.

Further, we propose Cisco Catalyst 6506 switches in each school building with Cisco Catalyst 2950 stackable switches in the various network closets.

Please be aware there are a few issues the district must address. They include providing adequate environmental conditions in the wiring closets and providing proper electrical power in the buildings. We do not believe these services are eligible under Year 6 of the E-rate program. MTG can provide the names of companies who offer such services.

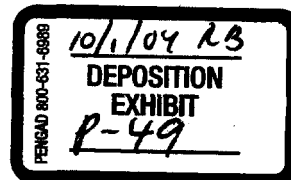
MTG has been providing technology solutions to schools and businesses since 1989. We offer the highest quality of support on both the Windows and Macintosh platforms. We understand the district uses a mix of Windows and Mac OS computers. We believe we can partner with the district to become a reliable and valued Systems Integrator.

We would appreciate to speak with you and the district regarding our complete proposal. I can be reached at (877) 366-3684 ext. 335. Please be aware, we recently moved our company headquarters to 311A Old Rodgers Road, Bristol, PA 19007. We can be reached on the web at www.mtgroupe.com.

Thank you for your time and courtesy.

Regards,

Richard D. Linkhorst
Account Executive



0300A